

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

**CEDARWOOD CONDOMINIUM OWNERS  
ASSOCIATION, a Washington non-profit  
corporation,**

Plaintiff,

V.

ALLSTATE INSURANCE COMPANY, a  
foreign insurance company,

Defendant.

NO. 18-CV-367-RSM

STIPULATION TO EXTEND  
DEADLINES INCLUDING TRIAL  
DATE

## I. STIPULATION

The parties, through their undersigned counsel of record, hereby request the Court to grant an extension of the trial date and associated remaining deadlines.

The parties are working diligently and cooperatively in an effort to organize discovery in this matter so as to maximize efficiency of time and resources while at the same time adequately preparing this matter for trial. These efforts include but are not limited to scheduling multiple out of state depositions around the holiday season. Granting the parties' stipulated and joint request to the Court for a continuance of the trial date and associated remaining deadlines will allow the parties to continue to work cooperatively to prepare this case for trial in a functional and efficient manner.

1 The existing and proposed new dates are as follows:

| 2<br>Event  | 3<br>Existing Deadline Per<br>4<br>Order Setting Trial | 5<br>Proposed New Date |
|---|--|------------------------|
| 6<br>Disclosure of expert testimony<br>7<br>under FRCP 26(a)(2)   | 8<br>December 7, 2018                                  | 9<br>February 15, 2019 |
| 10<br>Deadline for filing motions<br>11<br>related to discovery   | 12<br>December 21, 2018                                | 13<br>March 1, 2019    |
| 14<br>Discovery to be completed by  | 15<br>January 18, 2019                                 | 16<br>March 29, 2019   |
| 17<br>All dispositive motions must<br>18<br>be filed by   | 19<br>February 7, 2019                                 | 20<br>April 18, 2019   |
| 21<br>All Motions in limine must be<br>22<br>filed by   | 23<br>March 11, 2019                                   | 24<br>May 20, 2019     |
| 25<br>Agreed pretrial Order due   | 26<br>March 27, 2019                                   | 27<br>June 5, 2019     |
| 28<br>Trial briefs, proposed voir dire<br>29<br>questions, jury instructions,<br>30<br>neutral statement of the case,<br>31<br>and trial exhibits due | 32<br>April 3, 2019                                    | 33<br>June 12, 2019    |
| 34<br>Trial Date  | 35<br>April 8, 2019                                    | 36<br>June 17, 2019    |

14 DATED this 30<sup>th</sup> day of November, 2018.

15  
ASHBAUGH BEAL

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Attorneys for Defendant

## II. ORDER

IT IS SO ORDERED.

DATED this 4<sup>th</sup> day of December, 2018.

  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE